

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

07-CV-3258 (KMW)

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ARMAND CORLEW, VINCENT RIGGI, STEPHEN
CERNAK, JR., RUTH DEPAOLO and ANGELO
RIGGI, individually and on behalf of a class similarly
situated,

AFFIDAVIT

Plaintiffs,

-against-

GENERAL ELECTRIC COMPANY, MONSANTO
COMPANY, PHARMACIA CORPORATION and
SOLUTIA, INC.,

Defendants.

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Ruth DePaolo, being duly sworn, deposes and says:

That I am one of the named plaintiffs herein. I presently reside at 67 Cheltingham Street, Schenectady, New York 12306 and I have continuously resided at this location for the last forty-four years.

That I was not aware that PCBs contaminated my property until I was advised of the results of testing of soil samples collected from my property on or about April 20, 2006. I was thereafter advised of the results which revealed elevated levels of PCBs on my property. Prior to obtaining these results, I had absolutely no knowledge that PCBs were being emitted from the General Electric Main Plant and were contaminating my property. I was never advised by anyone that my property, and the residents thereof, were exposed to PCBs from any source.

That I never learned from any media source that any problem, or potential problem, existed in connection with PCB contamination and exposure from the GE Main Plant. The first time I learned that a potential health problem existed was when I was advised of the results of blood serum testing for PCBs.

My blood sample was collected on March 14, 2007 and I was advised of the results after the appropriate testing was performed on same. The results revealed that I had elevated levels of PCBs in my blood.

Dated: White Plains, New York
May 14, 2007

Ruth DePaolo
Ruth DePaolo

Sworn to before me this
15 day of May, 2007

Delores S. Longuzzi
Notary Public 9/20/08